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IN THE UNITED STATES DISTRICT COURT
DISTRICT OF UTAH, CENTRAL DIVISION

UNITED STATES OF AMERICA,	:	MOTION TO SUPPRESS
Plaintiff,	:	
v.	:	
RAMON ARMANDO LOPEZ,	:	Case No. 2:12-cr-261DAK
Defendant.	:	Honorable Dale A. Kimball

The defendant, Ramon Lopez, through his attorney of record, Scott C. Williams, hereby moves this Court to suppress all evidence discovered as a result of the illegal detention of Mr. Lopez followed by the illegal search of his vehicle, all occurring on May 9, 2012.

ISSUES PRESENTED

1. Whether Mr. Lopez was unlawfully detained by police on May 9, 2012 in violation of his rights under the Fourth Amendment to the United States Constitution by reason of a vehicle stop without reasonable articulable suspicion of criminal activity, or excessive scope of such detention beyond necessary to effectuate the purpose of the stop;

2. Whether Mr. Lopez' vehicle was unlawfully searched on May 9, 2012 without a

warrant or any exception to the warrant requirement pursuant to the Fourth Amendment of the United States Constitution.

Mr. Lopez respectfully requests that this Court schedule an evidentiary hearing related to the present motion. He further requests the opportunity to submit a memorandum of law after the evidentiary hearing in conformance with DUCrimR 12-1(d).

Respectfully submitted this 20th day of September, 2012.

/s/ Scott C. Williams

Scott C. Williams
Attorney for Ramon Armando Lopez

CERTIFICATE OF SERVICE

I hereby certify that on the 20th day of September, 2012 I electronically filed the foregoing **MOTION TO SUPPRESS** with the Clerk of Court using the CM/ECF system which sent notification of such filing to the following:

Mr. Don Brown
Special Assistant United States Attorney
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Email: Donbrown@utah.gov

/s/ Scott C. Williams
